

EXHIBIT A

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -
5 E. JEAN CARROLL,

6 Plaintiff,

7 -against-

8 DONALD J. TRUMP, in his personal capacity,
9
10 Defendant.

11
12 *** CONFIDENTIAL ***

13
14 Remote deposition of CAROL MARTIN, taken
15 pursuant to Notice, was held via videoconference,
16 commencing October 18, 2022, at 10:01 a.m., on the
17 above date, before Amanda McCredo, a Court Reporter
18 and Notary Public in the State of New York.

1 C. Martin - Confidential

2 MR. BIALE: Objection to form.

3 BY MR. SWIFT:

4 Q Are you able to answer that, Ms. Martin?

5 A We were friends and coworkers.

6 Q How would you characterize your
7 relationship with Ms. Carroll today? And when I say
8 "today," I mean over the last couple of years or so.

9 A Friends.

10 Q When you say "friends," do you see her on a
11 regular basis?

12 A I don't -- regular basis, meaning?

13 Q Do you see her -- have you seen her over
14 the last two years?

15 A Yes.

16 Q Do you know on how many occasions you've
17 seen her over the last two years?

18 A Half a dozen. About six times.

19 Q Do you also -- over the last two years,
20 have you also texted with her?

21 A Yes, I have.

22 Q And if you could give an approximation how
23 often you text with Ms. Carroll over the last two
24 years?

25 A How frequently? How often?

C. Martin - Confidential

Q Correct.

A Twice a month. Maybe more. Maybe more.

I'm just estimating. We go in and out.

Q Understood.

I know with texting, talking on the phone is a bit outdated today.

But over the last couple of years, can you estimate how many times you've spoken on the phone with Ms. Carroll?

MS. CROWLEY: Objection to form.

"Last couple of years" is pretty vague. Do you want to give an actual timeframe?

MR. SWIFT: Okay.

BY MR. SWIFT:

Q 2020 to the present, January 2020 to the present.

A Difficult to say. It would have been COVID, so texting may have been more. Same answer. Maybe a few more. Six or eight times.

Q When you communicated with Ms. Carroll for the last couple of years, was this purely about personal-type issues or did you also speak about work issues?

MR. BIALE: Objection to form.